

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

LEONARDO ALMONTE-RAMIREZ

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1:14-CR-00021-JL

ASSENTED TO MOTION TO CONTINUE

Now comes, the defendant who requests that the currently scheduled pretrial and jury selection scheduled for June 10, 2014 and the week of June 17, 2014 be continued to August of 2014.

The defendant requests this continuance so that he may consult with an attorney with expertise in immigration law above and beyond that possessed by undersigned counsel. Said consultation may have the effect of conserving resources of the court, government, and the defendant. Undersigned counsel recognizes that criminal defense attorneys have duties related to their client's immigration situations. However, the case at bar has certain complicating factors due to the current charges and the defendant's criminal record that make direct consultation with an immigration lawyer advisable and useful. Undersigned counsel is assisting with finding an appropriate immigration lawyer.

The request for August is made due to the July Trial and vacation schedules of both attorneys in this case.

The defendant and the government also request that the Court enter an order excluding the period of the continuance from the Speedy Trial Act calculations for this

case. The defendant has signed a Waiver of Speedy Trial. Assistant United States Attorney Abramson has assented to this Motion.

Respectfully submitted,

Dated: June 3, 2014

/s/ Charles A. Bookman  
Bookman & Al-Marayati  
802 Main Street  
Melrose, MA 02176  
(781) 712-0007  
NH BAR# 11399

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the within Motion was this day served upon all counsel of record by electronic notification.

Dated: June 3, 2014

/s/ Charles A. Bookman  
Bookman & Al-Marayati